

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

VOIP-PAL.COM, INC.

Plaintiff,

v.

FACEBOOK, INC., and
WHATSAPP, INC.,

Defendants.

CIVIL ACTION NO. 6:20-cv-267-ADA

VOIP-PAL.COM, INC.

Plaintiff,

v.

GOOGLE, LLC,

Defendant.

CIVIL ACTION NO. 6:20-cv-269-ADA

VOIP-PAL.COM, INC.

Plaintiff,

v.

AMAZON.COM, INC.;
AMAZON.COM SERVICES LLC; and
AMAZON.COM WEB SERVICES, INC.;

Defendants.

CIVIL ACTION NO. 6:20-cv-272-ADA

VOIP-PAL.COM, INC.

Plaintiff,

v.

APPLE, INC.,

Defendant.

CIVIL ACTION NO. 6:20-cv-275-ADA

VOIP-PAL.COM, INC.

Plaintiff,

v.

AT&T CORPORATION;
AT&T SERVICES, INC.; and
AT&T MOBILITY, LLC;

Defendants.

CIVIL ACTION NO. 6:20-cv-325-ADA

VOIP-PAL.COM, INC.

Plaintiff,

v.

VERIZON COMMUNICATIONS, INC.;
CELLCO PARTNERSHIP dba VERIZON
WIRELESS;
VERIZON SERVICES, CORP.; and
VERIZON BUSINESS NETWORK
SERVICES, INC.;

Defendants.

CIVIL ACTION NO. 6:20-cv-327-ADA

NOTICE OF RELATED CASES

Plaintiff VoIP-Pal.com, Inc. (“VoIP-Pal”) notifies the Court that on March 24, 2021, VoIP-Pal filed a Notice of Voluntary Dismissal in *VoIP-Pal.com, Inc. v. Apple, Inc.*, Civil Action No. 6:20-cv-275-ADA (WDTX). A copy of the notice is attached as Exhibit A. VoIP-Pal also filed a Notice of Consent to Granting Motion to Dismiss under First-Filed Rule in *VoIP-Pal.com, Inc. v. AT&T, Corp.*, Civil Action No. 6:20-cv-325-ADA (WDTX) and *VoIP-Pal.com, Inc. v. Verizon Communications, Inc.*, Civil Action No. 6:20-cv-327-ADA (WDTX). A copy of the notice is attached as Exhibit B.

Separately, VoIP-Pal filed a Motion to Dismiss for lack of subject-matter jurisdiction in each of the following declaratory-judgment actions involving the ’606 patent pending in the Northern

District of California: *Twitter, Inc. v. VoIP-Pal.com, Inc.*, 5:20-cv-2397-LHK (N.D. Cal.); *Apple, Inc. v. VoIP-Pal.com, Inc.*, 5:20-cv-2460-LHK (N.D. Cal.); *AT&T Corp. et al., v. VoIP-Pal.com, Inc.*, 5:20-cv-2995-LHK (N.D. Cal.); and *Cellco Partnership dba Verizon Wireless v. VoIP-Pal.com, Inc.*, 5:20-cv-03092-LHK (N.D. Cal.). VoIP-Pal's motions grant Twitter, Apple, AT&T, and Verizon a covenant not to sue on the '606 patent and divests the Northern District of California of jurisdiction of those actions. Copies of the motions are attached as Exhibits C-F.

VoIP-Pal believes that the filings identified above resolve or will soon resolve all pending actions involving the '606 patent between VoIP-Pal and Apple, AT&T, and Verizon, who are the only parties in the above-identified cases that (1) have co-pending declaratory judgment actions in the Northern District of California and (2) are asserting first-filed status based on those actions. Additionally, because VoIP-Pal's covenant not to sue in the Twitter case resolves or will soon resolve that action, there will soon be no pending cases in the Northern District of California involving the '606 patent. As such, VoIP-Pal's WDTX cases against Amazon, Google, and Facebook will soon be the only pending cases in any court involving the '606 patent.

As stated in the parties' Notice of Decision March 1, 2021, several venue-related issues remain to be resolved in the Amazon, Google, and Facebook/WhatsApp cases. In the Amazon case, the Court has yet to rule on VoIP-Pal's motion to strike, or alternatively, motion for leave to conduct venue discovery and to file a sur-reply. *See* Case No. 6:20-cv-272, Dkt. No. 43. In the Google case, the Court has yet to rule on VoIP-Pal's request to depose Google's venue declarant. *See* Case No. 6:20-cv-269, Dkt. No. 37. In the Facebook/WhatsApp case, the parties have yet to complete venue discovery and VoIP-Pal has yet to file its Opposition to Facebook/WhatsApp's motion to transfer. *See* Case No. 6:20-cv-269, Dkt. No. 35. In light of today's filings, VoIP-Pal believes the Amazon, Google, and Facebook/WhatsApp cases are in or will soon be in a position to have the stay lifted such

that the parties can complete the discovery and briefing related to the pending motions in those cases.

Dated: March 24, 2021

Respectfully submitted,

By: /s/Lewis E. Hudnell, III

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**ATTORNEYS FOR PLAINTIFF
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CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of the forgoing NOTICE OF RELATED CASES via the Court's CM/ECF system pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5(b)(1) this 24th day of March, 2021.

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